

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE
ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions. Other defendants remain in these actions, and plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Barbara R. Bins
Barbara R. Binis
Stephen J. McConnell
Tracy G. Weiss
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsmith.com

Attorney for Defendant American Medical Systems, Inc.

/s/ Andy Dow Birchfield, Jr.

Andy Dow Birchfield, Jr.
BEASLEY ALLEN CROW METHVIN
PORTIS & MILES
P. O. Box 4160
Montgomery, AL 36103-4160
334.269.2343 (phone)
334.954.7555 (fax)
andy.birchfield@beasleyallen.com
Attorney for Plaintiffs on Exhibit A

/s/ Robert E. Price

Robert E. Price
LEVIN PAPANTONIO THOMAS
MITCHELL RAFFERTY & PROCTOR
316 South Baylen Street, Suite 600
Pensacola, FL 32502
850.435.7075 (phone)
850.436.6075 (fax)
rprice@levinlaw.com
Attorney for Plaintiffs on Exhibit B

/s/Brian Loncar

Brian Loncar
LONCAR & ASSOCIATES
424 South Cesar Chavez Boulevard
Dallas, TX 75201
800.285.4878 (phone)
214.382.4163 (fax)
bloncar@brianloncar.com
Attorney for Plaintiffs on Exhibit C

Dated: January 9, 2015